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Counsel for Plaintiffs

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

LANCE DOWNES-COVINGTON, an individual, SOLDADERA SANCHEZ, an individual, ROBERT O'BRIEN, an individual, EMILY DRISCOLL, an individual, ALISON KENADY, an individual, TENISHA MARTIN, an individual, GABRIELA MOLINA, an individual,

Plaintiffs,

VS.

LAS VEGAS METROPOLITAN POLICE DEPARTMENT, in its official capacity; LIEUTENANT KURT MCKENZIE, as an individual and in his capacity as a Las Vegas Metropolitan Police Department Officer; OFFICER TABATHA DICKSON, as an individual and in her capacity as a Las Vegas Metropolitan Police Department Officer; CAPTAIN PATRICIA SPENCER, as an individual and in her capacity as a Las Vegas Metropolitan Police Department Officer; CAPTAIN DORI KOREN, as an individual and in his capacity as a Las Vegas Metropolitan Police Department Officer; EVAN SPOON, as an individual and in his capacity as a Las Vegas Metropolitan Police Department Officer; JORDAN TURNER, as an individual and in his capacity as a Las Vegas Metropolitan Police Department Officer; UNKNOWN OFFICERS 1-14, as individuals and in their capacity as Las Vegas Metropolitan Police Department Officers,

Defendants.

Case No.: 2:20-cv-01790-CDS-DJA

**STIPULATION AND ORDER TO
EXTEND DISCOVERY PLAN
AND SCHEDULING ORDER
DEADLINES**

(THIRTEENTH REQUEST)

As amended on pages 2 and 27

1 **STIPULATION AND ORDER TO EXTEND DISCOVERY PLAN AND**
 2 **SCHEDULING ORDER DEADLINES (THIRTEENTH REQUEST)**

3 Plaintiffs Lance Downes-Covington, Soldadera Sanchez, Robert O'Brien, Emily
 4 Driscoll, Alison Kenady, Tenisha Martin, and Gabriela Molina ("Plaintiffs"), by and through
 5 their attorneys of record, Margaret A. McLetchie, Esq., Leo S. Wolpert, Esq., and Pieter M.
 6 O'Leary, Esq., with the law firm of McLetchie Law and Defendants, the Las Vegas
 7 Metropolitan Police Department (the "Department" or "LVMPD"), Lieutenant Kurt
 8 McKenzie ("McKenzie"), Officer Tabatha Dickson ("Dickson"), Captain Patricia Spencer
 9 ("Spencer"), Captain Dori Koren ("Koren"), Officer Evan Spoon ("Spoon"), and Officer
 10 Jordan Turner ("Turner"), collectively ("LVMPD Defendants"), by and through their
 11 attorneys of record, Craig R. Anderson, Esq. and Jackie V. Nichols, Esq., with the law firm
 12 of Marquis Aurbach, hereby stipulate and agree to extend the Discovery Plan and Scheduling
 13 ~~sixty (60)~~ ninety (90) Order deadlines an additional ~~sixty (60)~~ days. This Stipulation is being entered in good faith
 14 and not for purposes of delay (supplemented information noted in **bold-face** type).

15 **I. STATUS OF DISCOVERY.**

16 **A. PLAINTIFFS' DISCOVERY.**

17 1. Plaintiffs' Initial Disclosure of Witnesses and Documents Pursuant to FRCP
 18 26.1(a)(1) dated January 20, 2021;

19 2. Plaintiff Lance Downes-Covington's Responses to LVMPD's First Set of
 20 Interrogatories dated May 13, 2021;

21 3. Plaintiff Soldadera Sanchez's Responses to LVMPD's First Set of
 22 Interrogatories dated May 13, 2021;

23 4. Plaintiff Robert O'Brien's Responses to LVMPD's First Set of
 24 Interrogatories dated May 13, 2021;

25 5. Plaintiff Emily Driscoll's Responses to LVMPD's First Set of
 26 Interrogatories dated May 13, 2021;

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1 6. Plaintiff Alison Kenady's Responses to LVMPD's First Set of
2 Interrogatories dated May 13, 2021;

3 7. Plaintiff Tenisha Martin's Responses to LVMPD's First Set of
4 Interrogatories dated May 13, 2021;

5 8. Plaintiff Gabriela Molina's Responses to LVMPD's First Set of
6 Interrogatories dated May 13, 2021;

7 9. Plaintiff Lance Downes-Covington's Responses to LVMPD's First Set of
8 Requests for Production of Documents dated May 13, 2021;

9 10. Plaintiff Soldadera Sanchez's Responses to LVMPD's First Set of Requests
10 for Production of Documents dated May 13, 2021;

11 11. Plaintiff Robert O'Brien's Responses to LVMPD's First Set of Requests for
12 Production of Documents dated May 13, 2021;

13 12. Plaintiff Emily Driscoll's Responses to LVMPD's First Set of Requests for
14 Production of Documents dated May 13, 2021;

15 13. Plaintiff Alison Kenady's Responses to LVMPD's First Set of Requests for
16 Production of Documents dated May 13, 2021;

17 14. Plaintiff Tenisha Martin's Responses to LVMPD's First Set of Requests for
18 Production of Documents dated May 13, 2021;

19 15. Plaintiff Gabriela Molina's Responses to LVMPD's First Set of Requests
20 for Production of Documents dated May 13, 2021;

21 16. Plaintiff Lance Downes-Covington's First Set of Interrogatories to LVMPD
22 dated June 2, 2021;

23 17. Plaintiffs' First Set of Requests for Production of Documents to LVMPD
24 dated June 2, 2021;

25 18. Plaintiff Emily Driscoll's First Set of Interrogatories to LVMPD dated July
26 1, 2021;

1 19. Plaintiffs' First Supplement to Initial Disclosure of Witnesses and
2 Documents Pursuant to FRCP 26.1(a)(1) dated July 1, 2021;

3 20. Plaintiffs' Second Supplement to Initial Disclosure of Witnesses and
4 Documents Pursuant to FRCP 26.1(a)(1) dated July 8, 2021;

5 21. Plaintiffs' Third Supplement to Initial Disclosure of Witnesses and
6 Documents Pursuant to FRCP 26.1(a)(1) dated July 12, 2021;

7 22. Plaintiff Soldadera Sanchez's Supplemental Responses to LVMPD's First
8 Set of Interrogatories dated July 8, 2021;

9 23. Plaintiff Robert O'Brien's Supplemental Responses to LVMPD's First Set
10 of Interrogatories dated July 8, 2021;

11 24. Plaintiff Emily Driscoll's Supplemental Responses to LVMPD's First Set
12 of Interrogatories dated July 8, 2021;

13 25. Plaintiff Alison Kenady's Supplemental Responses to LVMPD's First Set
14 of Interrogatories dated July 8, 2021;

15 26. Plaintiff Tenisha Martin's Supplemental Responses to LVMPD's First Set
16 of Interrogatories dated June 8, 2021;

17 27. Plaintiff Soldadera Sanchez's Supplemental Responses to LVMPD's First
18 Set of Requests for Production of Documents dated July 8, 2021;

19 28. Plaintiff Robert O'Brien's Supplemental Responses to LVMPD's First Set
20 of Requests for Production of Documents dated July 8, 2021;

21 29. Plaintiff Emily Driscoll's Supplemental Responses to LVMPD's First Set
22 of Requests for Production of Documents dated July 8, 2021;

23 30. Plaintiff Alison Kenady's Supplemental Responses to LVMPD's First Set
24 of Requests for Production of Documents dated July 8, 2021;

25 31. Plaintiff Tenisha Martin's Supplemental Responses to LVMPD's First Set
26 of Requests for Production of Documents dated July 8, 2021;



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1 32. Plaintiff Gabriela Molina's Supplemental Responses to LVMPD's First Set
2 of Requests for Production of Documents dated July 8, 2021;

3 33. Plaintiff Gabriela Molina's Second Supplemental Responses to LVMPD's
4 First Set of Requests for Production of Documents dated July 12, 2021;

5 34. Plaintiff Lance Downes-Covington's Supplemental Responses to
6 LVMPD's First Set of Requests for Production of Documents dated July 12, 2021;

7 35. Plaintiff Gabriela Molina's Supplemental Responses to LVMPD's First Set
8 of Interrogatories dated July 12, 2021;

9 36. Plaintiff Lance Downes-Covington's Supplemental Responses to
10 LVMPD's First Set of Interrogatories dated July 12, 2021;

11 37. Plaintiff Tenisha Martin's First Set of Interrogatories to LVMPD dated July
12 13, 2021;

13 38. Plaintiffs' Second Set of Requests for Production of Documents to LVMPD
14 dated July 13, 2021;

15 39. Plaintiff Tenisha Martin's Second Set of Interrogatories to LVMPD dated
16 July 14, 2021;

17 40. Plaintiffs' Third Set of Requests for Production of Documents to LVMPD
18 dated July 14, 2021;

19 41. Plaintiffs' Fourth Supplement to Initial Disclosure of Witnesses and
20 Documents Pursuant to FRCP 26.1(a)(1) dated September 15, 2021;

21 42. Plaintiff Tenisha Martin's Third Set of Interrogatories to LVMPD dated
22 September 15, 2021;

23 43. Plaintiffs' Fourth Set of Requests for Production of Documents to LVMPD
24 dated September 15, 2021;

25 44. Plaintiffs' First Set of Requests for Admission to LVMPD dated September
26 17, 2021;



1 45. Tenisha Martin's Responses to Lt. Kurt McKenzie's First Set of
2 Interrogatories dated December 16, 2021;

3 46. Soldadera Sanchez's Responses to Lt. Kurt McKenzie's First Set of
4 Interrogatories dated December 16, 2021;

5 47. Robert O' Brien's Responses to Lt. Kurt McKenzie's First Set of
6 Interrogatories dated December 16, 2021;

7 48. Lance Downes-Covington's Responses to Lt. Kurt McKenzie's First Set of
8 Interrogatories dated December 16, 2021;

9 49. Gabriela Molina's Responses to Lt. Kurt McKenzie's First Set of
10 Interrogatories dated December 16, 2021;

11 50. Emily Driscoll's Responses to Lt. Kurt McKenzie's First Set of
12 Interrogatories dated December 16, 2021;

13 51. Alison Kenady's Responses to Lt. Kurt McKenzie's First Set of
14 Interrogatories dated December 16, 2021;

15 52. Tenisha Martin's Responses to LVMPD's First Set of Requests for
16 Admissions dated December 16, 2021;

17 53. Soldadera Sanchez's Responses to LVMPD's First Set of Requests for
18 Admissions dated December 16, 2021;

19 54. Robert O'Brien's Responses to LVMPD's First Set of Requests for
20 Admissions dated December 16, 2021;

21 55. Lance Downes-Covington's Responses to LVMPD's First Set of Requests
22 for Admissions dated December 16, 2021;

23 56. Gabriela Molina's Responses to LVMPD's First Set of Requests for
24 Admissions dated December 16, 2021;

25 57. Emily Driscoll's Responses to LVMPD's First Set of Requests for
26 Admissions dated December 16, 2021;



1 58. Alison Kenady's Responses to LVMPD's First Set of Requests for
2 Admissions dated December 16, 2021;

3 59. Alison Kenady's First Set of Interrogatories to LVMPD dated April 1, 2022;

4 60. Emily Driscoll's Second Set of Interrogatories to LVMPD dated April 1,
5 2022;

6 61. Gabriella Molina's First Set of Interrogatories to LVMPD dated April 1,
7 2022;

8 62. Lance Downes-Covington's Second Set of Interrogatories to LVMPD dated
9 April 1, 2022;

10 63. Plaintiffs' Fifth Set of Requests for Production of Documents to LVMPD
11 dated April 1, 2022;

12 64. Robert O'Brien's First Set of Interrogatories to LVMPD dated April 1,
13 2022;

14 65. Plaintiffs' Second Set of Requests for Admissions to LVMPD dated April
15 1, 2022;

16 66. Sol Sanchez's First Set of Interrogatories to LVMPD dated April 1, 2022;

17 67. Plaintiffs' First Set of Requests for Production of Documents to Defendant
18 Joe Lombardo [Request Nos. 1-5] dated June 17, 2022;

19 68. Plaintiffs' First Set of Requests for Admissions to Defendant Tabatha
20 Dickson dated June 17, 2022;

21 69. Plaintiffs' First Set of Requests for Production of Documents to Defendant
22 Joe Lombardo [Request Nos. 1-4] dated June 17, 2022;

23 70. Soldadera Sanchez's Second Set of Interrogatories to LVMPD dated June
24 17, 2022;

25 71. Robert O'Brien's Second Set of Interrogatories to LVMPD dated June 17,
26 2022;

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1 72. Emily Driscoll's Third Set of Interrogatories to LVMPD dated June 17,
2 2022;

3 73. Lance Downes-Covington's Third Set of Interrogatories to LVMPD dated
4 June 17, 2022;

5 74. Plaintiffs' Sixth Set of Requests for Production of Documents to LVMPD
6 dated June 17, 2022;

7 75. Plaintiffs' Third Set of Requests for Admissions to LVMPD dated June 17,
8 2022;

9 76. Tenisha Martin's Fourth Set of Interrogatories to LVMPD dated June 17,
10 2022;

11 77. Lance Downes-Covington's First Set of Interrogatories to Officer Tabatha
12 Dickson dated June 17, 2022;

13 78. Soldadera Sanchez's First Set of Interrogatories to Joe Lombardo dated
14 June 17, 2022;

15 79. Soldadera Sanchez's First Set of Interrogatories to Lt. Kurt McKenzie dated
16 June 17, 2022;

17 80. Plaintiffs' First Set of Requests for Production of Documents to Defendant
18 Patricia Spencer dated June 17, 2022;

19 81. Plaintiffs' First Set of Requests for Production of Documents to Defendant
20 Dori Koren dated June 17, 2022;

21 82. Plaintiffs' First Set of Requests for Production of Documents to Joe
22 Lombardo [Request No. 1] dated June 17, 2022;

23 83. Plaintiffs' First Set of Requests for Production of Documents to Lt. Kurt
24 McKenzie dated June 17, 2022;

25 84. Tenisha Martin's First Set of Interrogatories to Lt. Kurk McKenzie dated
26 June 17, 2022;



1 85. Plaintiffs' Third Set of Requests for Admissions to LVMPD dated June 21,
2 2022;

3 86. Plaintiffs' Sixth Set of Requests for Production of Documents to LVMPD
4 dated June 21, 2022;

5 87. Emily Driscoll's Third Set of Interrogatories to LVMPD dated June 21,
6 2022;

7 88. Lance Downes-Covington's Third Set of Interrogatories to LVMPD dated
8 June 21, 2022;

9 89. Robert O'Brien's Second Set of Interrogatories to LVMPD dated June 21,
10 2022;

11 90. Soldadera Sanchez's First Set of Interrogatories to Lt. Kurt McKenzie dated
12 June 21, 2022;

13 91. Soldadera Sanchez's First Set of Interrogatories to Joe Lombardo dated
14 June 21, 2022;

15 92. Soldadera Sanchez's Second Set of Interrogatories to LVMPD dated June
16 21, 2022;

17 93. Plaintiffs' First Set of Requests for Admissions to Officer Tabatha Dickson
18 dated June 21, 2022;

19 94. Plaintiffs' First Set of Requests for Production of Documents to Joe
20 Lombardo [Request Nos. 1-5] dated June 21, 2022;

21 95. Plaintiffs' First Set of Requests for Production of Documents to Lt. Kurt
22 McKenzie dated June 21, 2022;

23 96. Plaintiffs' First Set of Requests for Production of Documents to Officer
24 Tabatha Dickson dated June 21, 2022;

25 97. Plaintiffs' First Set of Requests for Production of Documents to Patricia
26 Spencer dated June 21, 2022;



1 98. Plaintiffs' First Set of Requests for Production of Documents to Captain
2 Dori Koren dated June 21, 2022;

3 99. Lance Downes-Covington's First Set of Interrogatories to Officer Tabatha
4 Dickson dated June 21, 2022;

5 100. Tenisha Martin's First Set of Interrogatories to Lt. Kurt McKenzie dated
6 June 21, 2022;

7 101. Tenisha Martin's Fourth Set of Interrogatories to LVMPD dated June 21,
8 2022;

9 102. Plaintiff Emily Driscoll's Requests for Admissions to LVMPD - Set One
10 dated October 27, 2022.

11 103. Plaintiff Emily Driscoll's Interrogatories to LVMPD - Set Four dated
12 October 27, 2022.

13 104. Plaintiff Emily Driscoll's Interrogatories to Tabatha Dickson - Set One
14 dated October 27, 2022.

15 105. Plaintiff Emily Driscoll's Requests for Production of Documents to
16 LVMPD - Set One dated October 27, 2022.

17 106. Plaintiff Emily Driscoll's Requests for Production of Documents to Tabatha
18 Dickson - Set One dated October 27, 2022.

19 107. Plaintiff Emily Driscoll's Requests for Admissions to Tabatha Dickson -
20 Set One dated October 27, 2022.

21 108. Plaintiff Gabriela Molina's Interrogatories to LVMPD - Set Two dated
22 October 27, 2022.

23 109. Plaintiff Gabriela Molina's Interrogatories to Tabatha Dickson - Set One
24 dated October 27, 2022.

25 110. Plaintiff Gabriela Molina's Requests for Production of Documents to
26 LVMPD - Set One dated October 27, 2022.

1 111. Plaintiff Gabriela Molina's Requests for Production of Documents to
2 Tabatha Dickson - Set One dated October 27, 2022.

3 112. Plaintiff Gabriela Molina's Requests for Admissions to LVMPD - Set One
4 dated October 27, 2022.

5 113. Plaintiff Gabriela Molina's Requests for Admissions to Tabatha Dickson -
6 Set One dated October 27, 2022.

7 114. Plaintiff Lance Downes-Covington's Interrogatories to LVMPD - Set Four
8 dated October 27, 2022.

9 115. Plaintiff Lance Downes-Covington's Interrogatories to Tabatha Dickson -
10 Set Two dated October 27, 2022.

11 116. Plaintiff Lance Downes-Covington's Interrogatories to Jordan Turner - Set
12 One dated October 27, 2022.

13 117. Plaintiff Lance Downes-Covington's Requests for Production of
14 Documents to LVMPD - Set One dated October 27, 2022.

15 118. Plaintiff Lance Downes-Covington's Requests for Production of
16 Documents to Tabatha Dickson - Set One dated October 27, 2022.

17 119. Plaintiff Lance Downes-Covington's Requests for Production of
18 Documents to Jordan Turner - Set One dated October 27, 2022.

19 120. Plaintiff Lance Downes-Covington's Requests for Admissions to LVMPD
20 - Set One dated October 27, 2022.

21 121. Plaintiff Lance Downes-Covington's Requests for Admissions to Tabatha
22 Dickson - Set One dated October 27, 2022.

23 122. Plaintiff Lance Downes-Covington's Requests for Admissions to Jordan
24 Turner - Set One dated October 27, 2022.

25 123. Soldadera Sanchez's Requests for Production of Documents to LVMPD -
26 Set One dated November 7, 2022.



1 124. Soldadera Sanchez's Requests for Admissions to LVMPD - Set One dated
2 November 7, 2022.

3 125. Robert O'Brien's Interrogatories to LVMPD - Set One dated November 7,
4 2022.

5 126. Robert O'Brien's Requests for Production of Documents to LVMPD - Set
6 One dated November 7, 2022.

7 127. Robert O'Brien's Requests for Admissions to LVMPD - Set One dated
8 November 7, 2022.

9 128. Alison Kenady's Interrogatories to LVMPD - Set Two dated November 7,
10 2022.

11 129. Alison Kenady's Requests for Production of Documents to LVMPD - Set
12 One dated November 7, 2022.

13 130. Alison Kenady's Requests for Admissions to LVMPD - Set One dated
14 November 7, 2022.

15 131. Tenisha Martin's Requests for Production of Documents to LVMPD - Set
16 One dated November 7, 2022.

17 132. Tenisha Martin's Requests for Admissions to LVMPD - Set One dated
18 November 7, 2022.

19 133. Plaintiffs' Fifth Supplement to Initial Disclosure of Witnesses and
20 Documents Pursuant to FRCP 26.1(a)(1) dated January 4, 2023;

21 134. Plaintiffs' Sixth Supplement to Initial Disclosure of Witnesses and
22 Documents Pursuant to FRCP 26.1(a)(1) dated January 20, 2023.

23 135. Tenisha Martin's Requests for Production of Documents to LVMPD - Set
24 Two, dated January 17, 2023.

25 136. Tenisha Martin's Requests for Production of Documents to LVMPD – Set
26 Three, dated April 18, 2023.
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1 137. Plaintiff Lance Downes-Covington's Requests for Production to LVMPD -
2 Set Two dated May 16, 2023.

3 138. Plaintiff Gabriela Molina's Requests for Admissions to LVMPD - Set Two
4 dated June 14, 2023.

5 **B. DEFENDANTS' DISCOVERY.**

6 1. LVMPD Defendants' Initial Disclosure of Witnesses and Documents
7 Pursuant to FRCP 26.1(a)(1) dated January 20, 2021.

8 2. LVMPD's First Set of Interrogatories to Plaintiff Lance Downes-Covington
9 dated March 12, 2021.

10 3. LVMPD's First Set of Interrogatories to Plaintiff Soldadera Sanchez dated
11 March 12, 2021.

12 4. LVMPD's First Set of Interrogatories to Plaintiff Robert O'Brien dated
13 March 12, 2021.

14 5. LVMPD's First Set of Interrogatories to Plaintiff Emily Driscoll dated
15 March 12, 2021.

16 6. LVMPD's First Set of Interrogatories to Plaintiff Alison Kenady dated
17 March 12, 2021.

18 7. LVMPD's First Set of Interrogatories to Plaintiff Tenisha Martin dated
19 March 12, 2021.

20 8. LVMPD's First Set of Interrogatories to Plaintiff Gabriela Molina dated
21 March 12, 2021.

22 9. LVMPD's First Set of Request for Production of Documents to Plaintiff
23 Lance Downes-Covington dated March 12, 2021.

24 10. LVMPD's First Set of Request for Production of Documents to Plaintiff
25 Soldadera Sanchez dated March 12, 2021.



1 11. LVMPD's First Set of Request for Production of Documents to Plaintiff
2 Robert O'Brien dated March 12, 2021.

3 12. LVMPD's First Set of Request for Production of Documents to Plaintiff
4 Emily Driscoll dated March 12, 2021.

5 13. LVMPD's First Set of Request for Production of Documents to Plaintiff
6 Alison Kenady dated March 12, 2021.

7 14. LVMPD's First Set of Request for Production of Documents to Plaintiff
8 Tenisha Martin dated March 12, 2021.

9 15. LVMPD's First Set of Request for Production of Documents to Plaintiff
10 Gabriela Molina dated March 12, 2021.

11 16. LVMPD Defendants' First Supplement to Initial Disclosures of Witnesses
12 and Documents Pursuant to FRCP 26.1(a)(1) dated July 20, 2021.

13 17. LVMPD's Answers to Plaintiff Lance Downes-Covington's First Set of
14 Interrogatories dated July 20, 2021.

15 18. LVMPD's Responses to Plaintiffs' First Set of Requests for Production of
16 Documents dated July 20, 2021.

17 19. LVMPD's Responses to Plaintiff Emily Driscoll's First Set of
18 Interrogatories dated August 3, 2021.

19 20. LVMPD's Supplemental Answers to Plaintiff Lance Downes-Covington's
20 First Set of Interrogatories dated August 3, 2021.

21 21. LVMPD's Supplemental Responses to Plaintiffs' First Set of Requests for
22 Production of Documents dated August 3, 2021.

23 22. LVMPD Defendants' Second Supplement to Initial Disclosures of
24 Witnesses and Documents Pursuant to FRCP 26.1(a)(1) dated August 4, 2021.

25 23. LVMPD's Supplemental Answers to Plaintiff Lance Downes-Covington's
26 First Set of Interrogatories dated August 9, 2021.
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1 24. LVMPD Defendants' Third Supplement to Initial Disclosures of Witnesses
2 and Documents Pursuant to FRCP 26.1(a)(1) dated August 16, 2021.

3 25. LVMPD's Responses to Plaintiff Tenisha Martin's First Set of
4 Interrogatories dated August 16, 2021.

5 26. LVMPD's Responses to Plaintiff Tenisha Martin's Second Set of
6 Interrogatories dated August 16, 2021.

7 27. LVMPD's Responses to Plaintiffs' Third Set of Requests for Production of
8 Documents dated August 16, 2021.

9 28. LVMPD's Responses to Plaintiffs' Second Set of Requests for Production
10 of Documents dated August 30, 2021.

11 29. LVMPD's Responses to Plaintiff Tenisha Martin's Second Set of
12 Interrogatories dated August 30, 2021.

13 30. LVMPD Defendants' Fourth Supplement to Initial Disclosures of
14 Witnesses and Documents Pursuant to FRCP 26.1(a)(1) dated August 30, 2021.

15 31. LVMPD Defendants' Privilege Log dated August 30, 2021.

16 32. LVMPD's Amended Responses to Plaintiffs' Third Set of Requests for
17 Production of Documents dated September 13, 2021.

18 33. LVMPD's Amended Responses to Plaintiffs' Second Set of Requests for
19 Production of Documents dated September 13, 2021.

20 34. LVMPD's Amended Responses to Plaintiff Tenisha Martin's Second Set of
21 Interrogatories dated September 13, 2021.

22 35. LVMPD's Amended Responses to Plaintiff Emily Driscoll's First Set of
23 Interrogatories dated September 13, 2021.

24 36. Lt. McKenzie's First Set of Interrogatories to Plaintiff Lance Downes-
25 Covington dated September 22, 2021.

26 37. Lt. McKenzie's First Set of Interrogatories to Plaintiff Soldadera Sanchez
27 dated September 22, 2021.



1 38. Lt. McKenzie's First Set of Interrogatories to Plaintiff Robert O'Brien dated
2 September 22, 2021.

3 39. Lt. McKenzie's First Set of Interrogatories to Plaintiff Emily Driscoll dated
4 September 22, 2021.

5 40. Lt. McKenzie's First Set of Interrogatories to Plaintiff Alison Kenady dated
6 September 22, 2021.

7 41. Lt. McKenzie's First Set of Interrogatories to Plaintiff Tenisha Martin dated
8 September 22, 2021.

9 42. Lt. McKenzie's First Set of Interrogatories to Plaintiff Gabriela Molina
10 dated September 22, 2021.

11 43. LVMPD's First Set of Requests for Admission to Plaintiff Lance Downes-
12 Covington dated September 22, 2021.

13 44. LVMPD's First Set of Requests for Admission to Plaintiff Soldadera
14 Sanchez dated September 22, 2021.

15 45. LVMPD's First Set of Requests for Admission to Plaintiff Robert O'Brien
16 dated September 22, 2021.

17 46. LVMPD's First Set of Requests for Admission to Plaintiff Emily Driscoll
18 dated September 22, 2021.

19 47. LVMPD's First Set of Requests for Admission to Plaintiff Alison Kenady
20 dated September 22, 2021.

21 48. LVMPD's First Set of Requests for Admission to Plaintiff Tenisha Martin
22 dated September 22, 2021.

23 49. LVMPD's First Set of Requests for Admission to Plaintiff Gabriela Molina
24 dated September 22, 2021.

25 50. LVMPD Defendants' Fifth Supplement to Initial Disclosures of Witnesses
26 and Documents Pursuant to FRCP 26.1(a)(1) dated October 11, 2021.
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1 51. LVMPD's Responses to Plaintiffs' Fourth Set of Requests for Production
2 of Documents dated October 18, 2021.

3 52. LVMPD's Responses to Plaintiff Tenisha Martin's Third Set of
4 Interrogatories dated October 18, 2021.

5 53. LVMPD's Responses to Plaintiffs' First Set of Requests Admission dated
6 October 20, 2021.

7 54. LVMPD's Answers to Plaintiff Lance Downes-Covington's Second Set of
8 Interrogatories dated May 5, 2022.

9 55. LVMPD's Answers to Plaintiff Alison Kenady's First Set of Interrogatories
10 dated May 5, 2022.

11 56. LVMPD's Answers to Plaintiff Robert O'Brien's First Set of
12 Interrogatories dated May 5, 2022.

13 57. LVMPD's Answers to Plaintiff Sol Sanchez's First Set of Interrogatories
14 dated May 5, 2022.

15 58. LVMPD's Responses to Plaintiffs' Fifth Set of Requests for Production of
16 Documents dated May 5, 2022.

17 59. LVMPD's Answers to Plaintiff Emily Driscoll's Second Set of
18 Interrogatories dated May 5, 2022.

20 60. LVMPD's Answers to Plaintiff Gabriella Molina's First Set of
21 Interrogatories dated May 5, 2022.

22 61. LVMPD's Responses to Plaintiffs' Second Set of Requests for Admissions
23 dated May 5, 2022.

24 62. LVMPD's Second Supplemental Answers to Plaintiff Lance Downes-
25 Covington's First Set of Interrogatories dated June 24, 2022.

26 63. LVMPD's First Supplemental Responses to Plaintiffs' Second Set of
27 Requests for Production of Documents dated June 24, 2022.



1 64. LVMPD's First Supplemental Answers to Plaintiff Tenisha Martin's
2 Second Set of Interrogatories dated June 24, 2022.

3 65. LVMPD's Second Supplemental Responses to Plaintiffs' First Set of
4 Requests for Production of Documents dated June 24, 2022.

5 66. Lt. Kurt McKenzie's Answers to Soldadera Sanchez's First Set of
6 Interrogatories dated August 8, 2022.

7 67. Lt. Kurt McKenzie's Answers to Tenisha Martin's First Set of
8 Interrogatories dated August 8, 2022.

9 68. Lt. Kurt McKenzie's Responses to Plaintiffs' First Set of Requests for
10 Production of Documents dated August 8, 2022.

11 69. Patricia Spencer's Responses to Plaintiffs' First Set of Requests for
12 Production of Documents dated August 8, 2022.

13 70. Tabatha Dickson's Responses to Plaintiffs' First Set of Requests for
14 Admissions dated August 8, 2022.

15 71. Tabatha Dickson's Answers to Lance Downes-Covington's First Set of
16 Interrogatories dated August 8, 2022.

17 72. LVMPD's Responses to Plaintiffs' Third Set of Requests for Admissions
18 dated August 8, 2022.

19 73. LVMPD's Answers to Lance Downes-Covington's Third Set of
20 Interrogatories dated August 8, 2022.

21 74. LVMPD's Answers to Soldadera Sanchez's Second Set of Interrogatories
22 dated August 8, 2022.

23 75. Captain Dori Koren's Responses to Plaintiffs' First Set of Requests for
24 Production of Documents dated August 8, 2022.

25 76. Tabatha Dickson's Responses to Plaintiffs' First Set of Requests for
26 Production of Documents dated August 8, 2022.
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1 77. LVMPD's Answers to Robert O'Brien's Second Set of Interrogatories
2 dated August 8, 2022.

3 78. LVMPD's Answers to Tenisha Martin's Fourth Set of Interrogatories dated
4 August 8, 2022.

5 79. LVMPD's Responses to Plaintiffs' Sixth Set of Requests for Production of
6 Documents dated August 8, 2022.

7 80. LVMPD's Answers to Emily Driscoll's Third Set of Interrogatories dated
8 August 8, 2022.

9 81. LVMPD Defendants' Sixth Supplemental FRCP 26.1 Disclosures dated
10 August 8, 2022.

11 82. LVMPD Defendants' Seventh Supplemental FRCP 26.1 Disclosures dated
12 December 6, 2022.

13 83. Jordan Turner's Responses to Lance Downes-Covington's Requests for
14 Production - Set One, dated December 6, 2022.

15 84. Jordan Turner's Responses to Lance Downes-Covington's Requests for
16 Admission - Set One, dated December 6, 2022.

17 85. Jordan Turner's Responses to Lance Downes-Covington's Interrogatories -
18 Set One, dated December 6, 2022.

19 86. Jordan Turner's Responses to Lance Downes-Covington's Requests for
20 Admission - Set One, dated December 6, 2022.

21 87. Jordan Turner's Responses to Gabriela Molina's Requests for Production -
22 Set One, dated December 6, 2022.

23 88. Tabatha Dickson's Reponses to Lance Downes Covington's Requests for
24 Production - Set One, dated December 6, 2022.

25 89. Tabatha Dickson's Responses to Lance Downes-Covington's
26 Interrogatories - Set One, dated December 6, 2022.
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1 90. Tabatha Dickson's Responses to Lance Downes-Covington's
2 Interrogatories - Set Two, dated December 6, 2022.

3 91. Tabatha Dickson's Responses to Lance Downes-Covington's Requests for
4 Admission - Set One, dated December 6, 2022.

5 92. Tabatha Dickson's Responses to Lance Downes-Covington's Requests for
6 Production - Set One, dated December 6, 2022.

7 93. Tabatha Dickson's Responses to Gabriela Molina's Interrogatories - Set

8 94. One, dated December 6, 2022.

9 95. Tabatha Dickson's Responses to Gabriela Molina's Requests for Admission
10 - Set One, dated December 6, 2022.

11 96. Tabatha Dickson's Responses to Gabriela Molina's Interrogatories - Set
12 One, dated December 6, 2022.

13 97. Tabatha Dickson's Responses to Gabriela Molina's Requests for Production
14 - Set One, dated December 6, 2022.

15 98. Tabatha Dickson's Responses to Emily Driscolls' Requests for Admission
16 - Set One, dated December 6, 2022.

17 99. Tabatha Dickson's Responses to Emily Driscolls' Interrogatories - Set One,
18 dated December 6, 2022.

19 100. LVMPD'S Responses to Lance Downes Covington's Requests for
20 Production - Set One, dated December 6, 2022.

21 101. LVMPD'S Responses to Lance Downes Covington's Requests for
22 Admission - Set One, dated December 6, 2022.

23 102. LVMPD'S Responses to Lance Downes Covington's Interrogatories - Set
24 Four, dated December 6, 2022.

25 103. LVMPD's Responses to Emily Driscolls' Interrogatories - Set One, dated
26 December 6, 2022.



1 104. LVMPD's Responses to Emily Driscolls' Interrogatories - Set Four, dated
2 December 6, 2022.

3 105. LVMPD's Responses to Emily Driscolls' Requests for Admission - Set
4 One, dated December 6, 2022.

5 106. LVMPD's Responses to Emily Driscolls' Requests for Production - Set
6 One, dated December 6, 2022.

7 107. LVMPD's Responses to Gabriela Molina's Interrogatories - Set Two, dated
8

9 108. December 6, 2022.

10 109. LVMPD's Responses to Gabriela Molina's Requests for Production- Set
11 One, dated December 6, 2022.

12 110. LVMPD's Responses to Gabriela Molina's Requests for Admission - Set
13 One, dated December 6, 2022.

14 111. LVMPD Defendants' Eighth Supplemental FRCP 26.1 Disclosures dated
15 December 16, 2022.

16 112. LVMPD'S Responses to Tenisha Martin's Requests for Admission - Set
17 One, dated December 19, 2022.

18 113. LVMPD'S Responses to Soldadera Sanchez's Requests for Admission - Set
19 One, dated December 19, 2022.

20 114. LVMPD'S Responses to Robert O'Brien's Requests for Admission - Set
21 One, dated December 19, 2022.

22 115. LVMPD'S Responses to Alison Kenady's Requests for Admission - Set
23 One, dated December 19, 2022.

24 116. LVMPD'S Responses to Robert O'Brien's Interrogatories - Set One, dated
25 December 19, 2022.

26 117. LVMPD'S Responses to Alison Kenady's Requests for Production - Set
27 One, dated December 20, 2022.
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1 118. LVMPD'S Responses to Robert O'Brien's Requests for Production - Set
2 One, dated December 20, 2022.

3 119. LVMPD's Responses to Soldadera Sanchez' Requests for Production - Set
4 One, dated December 20, 2022.

5 120. LVMPD'S Responses to Tenisha Martin's Requests for Production - Set
6 One, dated December 20, 2022.

7 121. LVMPD'S Responses to Alison Kenady's Interrogatories - Set Two, dated
8 January 4, 2023.

9 122. LVMPD'S Responses to Robert O'Brien's Interrogatories - Set Three,
10 dated January 4, 2023.

11 123. LVMPD's Ninth Supplemental Disclosure of Witnesses and Documents
12 Pursuant to FRCP 26.1(a)(1), dated February 16, 2023.

13 124. LVMPD's First Supplemental Answers to Plaintiff Robert O'Brien's First
14 Set of Interrogatories, dated February 16, 2023.

15 125. LVMPD's First Supplemental Answers to Plaintiff Soldadera Sanchez's
16 Second Set of Interrogatories, dated February 16, 2023.

17 126. LVMPD's Third Supplemental Responses to Plaintiffs' First Set of
18 Requests for Production of Documents, dated February 16, 2023.

19 127. LVMPD's Second Supplemental Responses to Plaintiff's Second Set of
20 Requests for Production of Documents, dated February 16, 2023.

21 128. LVMPD's First Supplemental Responses to Plaintiffs' Sixth Set of
22 Requests for Production of Documents, dated February 16, 2023.

23 129. LVMPD'S Responses to Plaintiff Tenisha Martin's Requests for Production
24 of Documents - Set One [sic Set Two], dated February 16, 2023.

25 130. LVMPD's Tenth Supplemental Disclosure of Witnesses and Documents
26 Pursuant to FRCP 26.1(a)(1), dated February 24, 2023.

1 131. LVMPD's Responses to Tenisha Martin's Requests for Production of
2 Documents - Set Three dated May 22, 2023.

3 132. LVMPD's Responses to Gabriela Molina's Requests for Admissions - Set
4 Two dated July 17, 2023.

5 133. LVMPD's Responses to Lance Downes-Covington's Requests for
6 Production of Documents - Set Two dated July 17, 2023.

7 134. LVMPD's Eleventh Supplemental Disclosure of Witnesses and Documents
8 Pursuant to FRCP 26.1(a)(1), dated July 17, 2023.

9
10 **C. DEPOSITIONS.**

11 135. LVMPD Defendants deposed Plaintiff Alison Kenady on August 9, 2022.

12 136. LVMPD Defendants deposed Plaintiff Gabriela Molina on August 10,
13 2022.

14 137. LVMPD Defendants deposed Plaintiff Emily Driscoll on August 11, 2022.

15 138. LVMPD Defendants deposed Plaintiff Tenisha Martin on August 16, 2022.

16 139. LVMPD Defendants deposed Plaintiff Lance Downes-Covington on
17 August 19, 2022.

18 140. LVMPD Defendants deposed Plaintiff Soldadera Sanchez on August 20,
19 2022.

20 141. Plaintiffs deposed Defendant Officer Jordan Turner on October 18, 2022.

21 142. Plaintiffs deposed Defendant Officer Tabatha Dickson on October 24, 2022.

22 143. Plaintiffs deposed Defendant Officer Evan Spoon on November 7, 2022.

23 144. Plaintiffs deposed Defendant Retired Captain Patricia Spencer on
24 November 15, 2022.

25 145. Plaintiffs deposed Defendant Captain Dori Koren on November 22, 2022.

26 146. Plaintiffs deposed Defendant Lt. Kurt McKenzie on December 21, 2022.

27 147. LVMPD Defendants deposed Plaintiff Robert O'Brien on March 24, 2023.

1 148. Plaintiffs deposed LVMPD Defendants' FRCP 30(b)(6) designee(s) - Lt.
 2 Landon Reyes on June 20, 2023.

3 **149. Plaintiffs will be deposing Defendants' FRCP 30(b)(6) designee Dori
 4 Koren) in January 2024.**

5 **150. Plaintiffs took volume one of Defendants' FRCP 30(b)(6) designee John
 6 McGrath on November 16, 2023, and volume two will take place in January 2024.**

7 151. Plaintiffs' Deposition Subpoena to Las Vegas Justice Court per FRCP
 8 30(b)(6) for records related to Defendants' citations and arrests during the 2020 BLM
 9 Protests.

10 152. Plaintiffs' Deposition Subpoena to Las Vegas Municipal Court per FRCP
 11 30(b)(6) for records related to Defendants' citations and arrests during the 2020 BLM
 12 Protests.

13 **II. DISCOVERY THAT REMAINS TO BE COMPLETED.**

14 The Parties are actively conducting discovery and have completed the majority of
 15 the written discovery and depositions. However, the Parties are continuing to meet and confer
 16 on outstanding discovery issues including, but not limited to (1) Plaintiffs' deposition
 17 subpoenas to Justice Court and Municipal Court and (2) Defendants' deficient discovery
 18 responses,

19 The Parties' primary remaining discovery tasks include: (1) Plaintiffs have
 20 subpoenaed records from the Las Vegas Municipal Court and Las Vegas Justice Court for
 21 documents concerning Defendant's misdemeanor citations and arrests during the BLM
 22 Protests in 2020 and are in the process of obtaining records related to the same; (2) resolution
 23 of meet and confer issues and motion practice if needed; (3) Plaintiffs' deposition of
 24 Defendant Las Vegas Metropolitan Police Department's FRCP 30(b)(6) designee(s); (4)
 25 expert disclosures; (5) rebuttal reports; and (6) depositions of the experts.

1 **III. SPECIFIC DESCRIPTION OF WHY EXTENSION IS NECESSARY.**

2 This is the **thirteenth** request for an extension of discovery deadlines in this matter.
 3 The Parties request that the Discovery Plan and Scheduling Order deadlines be extended an
 4 additional ninety (90) days so that the Parties may complete the tasks above and efficiently
 5 manage expert disclosures. **This involves waiting for deposition transcripts requiring**
 6 **expert review and analysis.**

7 The Parties acknowledge that, pursuant to Local Rule 26-3, the Parties must
 8 establish that good cause exists to extend the deadlines.

9 The Parties have been diligently conducting discovery and continue to conduct
 10 discovery, but an extension is still needed to efficiently conclude discovery and manage the
 11 case.

12 Additionally, the parties are continuing to meet and confer with Defendants'
 13 counsel regarding the FRCP 30(b)(6) deposition and subpoenas. Meet and confer efforts are
 14 ongoing. Plaintiffs have also brought a Motion for Sanctions regarding the failure to activate
 15 BWCs, preserve BWC video footage, and/or produce BWC video footage. **The Parties**
 16 **agree that supplemental briefing is necessary regarding Plaintiffs' Motion for**
 17 **Sanctions.** Likewise, the experts retained in this matter will also need to review the recent
 18 discovery responses, Defendants' supplemental responses (if any), information and
 19 documents in response to Plaintiffs' subpoenas to Justice Court and Municipal Court, BWC
 20 videos, and all deposition transcripts, including the FRCP 30(b)(6) designees currently
 21 scheduled for in or about October due to the schedule conflicts of counsel and the designees,
 22 after the current deadline for initial expert disclosures. The Parties are working with their
 23 respective experts to prepare their expert disclosures. However, as noted, the Parties contend
 24 that it is more efficient to allow further discovery to be completed before initial expert
 25 disclosures to minimize the need for supplementation.

26 Finally, the Parties together request this in good faith and to further the resolution
 27 of this complicated case on the merits, and not for any purpose of delay.
 28

1 The Parties thus respectfully request an extension of time to enable them to conduct
 2 necessary discovery and so that this matter is fairly resolved on the merits. “Good cause to
 3 extend a discovery deadline exists ‘if it cannot reasonably be met despite the diligence of the
 4 party seeking the extension.’” *Derosa v. Blood Sys., Inc.*, No. 2:13-cv-0137-JCM-NJK, 2013
 5 U.S. Dist. LEXIS 108235, 2013 WL 3975764, at 1 (D. Nev. Aug. 1, 2013) (quoting *Johnson*
 6 *v. Mammoth Recreations, Inc.*, 975 F.2d 604, 609 (9th Cir. 1992)); *see also* Fed. R. Civ. P.
 7 1 (providing that the Rules of Civil Procedure “should be construed, administered, and
 8 employed by the court and the Parties to secure the just, speedy, and inexpensive
 9 determination of every action and proceeding”). As the procedural history of this case
 10 illustrates, the Parties have been diligent in litigating this matter. Significant written
 11 discovery has been exchanged, nearly all depositions are complete, experts are engaged, and
 12 counsel continue to meet and confer regarding various topics. Additionally, counsel for the
 13 Parties in this matter are litigating several other unrelated matters (including against each
 14 other) which have competing demands. While competing demands of litigation are merely
 15 one of many reasons for the instant request, it should be noted that the other litigation
 16 between the same counsel involving similar issues can only benefit from the completion of
 17 discovery in this matter so that in other litigation, similar requests can be expedited and can
 18 further the resolution of those matters and the interests of justice. Indeed, counsel for the
 19 Parties continue to engage in settlement discussions regarding this and the other matters they
 20 are litigating that stem from the BLM protests.

21 Thus, the standards to extend all deadlines, including the expert deadlines, is
 22 satisfied here.

23 Based on the foregoing stipulation and proposed deadlines, the Parties thus
 24 respectfully request an extension of time to extend the deadlines in this matter to enable to
 25 them to conduct necessary discovery and so that this matter is fairly resolved on the merits.

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1 **IV. PROPOSED SCHEDULE FOR COMPLETING ALL REMAINING
DEADLINES**

	Current Deadline	Proposed New Deadline
Amend Pleadings and Add Parties	Past/Unchanged	Past/Unchanged
Initial Expert Disclosures	December 4, 2023	March 5, 2024
Rebuttal Expert Disclosures	January 9, 2024	April 9, 2024
Discovery Cut-Off	January 29, 2024	April 29, 2024
Dispositive Motions	March 22, 2024	April 22, 2024 June 20, 2024
Pretrial Order	April 5, 2024	July 3, 2024 If dispositive motions are filed, the deadline for shall be suspended until thirty (30) days after the decision of the dispositive motions or further order of the Court.)

12 Based on the foregoing stipulation and proposed deadlines plan, the Parties request
 13 that the Discovery Plan and Scheduling Order deadlines be extended an additional ~~sixty (60)~~
 14 ~~ninety (90)~~ days so that the parties may conduct additional discovery, and efficiently manage expert
 15 disclosures.

16 Dated this 1st day of December, 2023.

17 **MCLETCHE LAW**

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 27 *Attorneys for Plaintiffs*

28 Dated this 1st day of December, 2023.

1 **MARQUIS AURBACH**

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 8 Las Vegas, Nevada 89145
 9 *Attorneys for Defendants Las Vegas
 10 Metropolitan Police Department,
 11 Lieutenant Kurt McKenzie, Officer
 12 Tabatha Dickson, Captain Patricia
 13 Spencer, Captain Dori Koren, Officer
 14 Evan Spoon and Officer Jordan Turner*

1 IT IS THEREFORE ORDERED that the parties' stipulation (ECF No. 177) is
2 GRANTED

3 IT IS SO ORDERED this 4th day of December, 2023.



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5 DANIEL J. ALBREGTS
6 UNITED STATES MAGISTRATE JUDGE
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